

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

REBECCA GARTENBERG, PERIE
HOFFMAN, JACOB KHALILI, GABRIEL
KRET, TAYLOR ROSLYN LENT,
BENJAMIN MEINER, MICHELLE
MEINER, MEGHAN NOTKIN, GILA
ROSENZWEIG, and ANNA WEISMAN

Plaintiffs,

v.

THE COOPER UNION FOR THE
ADVANCEMENT OF SCIENCE AND
ART

Defendant.

Case No. 24-cv-2669

**DECLARATION OF JACQUELINE LEE
BONNEAU SUPPORTING THE
COOPER UNION FOR THE
ADVANCEMENT OF SCIENCE AND
ART’S REPLY BRIEF IN FURTHER
SUPPORT OF ITS MOTION TO
DISMISS AND MOTION TO STRIKE**

I, Jacqueline Lee Bonneau, declare and state as follows:

1. I am an attorney admitted to practice in the State of New York, counsel at the law firm of Patterson Belknap Webb & Tyler LLP, and counsel for Defendant The Cooper Union for the Advancement of Science and Art (“Cooper Union”) in the above-captioned action. I am familiar with the facts set forth in this declaration. I am competent and willing to testify to the matters contained in this declaration. I submit this declaration supporting Cooper Union’s Reply Brief in further support of its Motion to Dismiss Plaintiffs’ Complaint and Motion to Strike certain of Plaintiffs’ requests for relief.

2. Attached as Exhibit 1 is a true and correct copy of a message sent by Natalie Brooks, Chief Talent Officer, Chris Chamberlin, Dean of Students, and Demetrius Eudell, Vice President of Academic Affairs to the Cooper Union community on October 9, 2023, entitled

“Support for Students, Faculty, and Staff re: Israel-Hamas War,” which is referred to in paragraphs 50 and 51 of the Complaint in this action.

3. Attached as Exhibit 2 is a true and correct copy of the Amicus Curiae Brief of the Foundation for Individual Rights and Expression [Dkt. #87], in *Kestenbaum et al. v. President and Fellows of Harvard College*, No. 1:24-cv-10092 (D. Mass. July 16, 2024).

4. Attached as Exhibit 3 is a true and correct copy of the Order on the Motion for Preliminary Injunction [Dkt. #89], in *Frankel et al. v. Regents of the University of California et al.*, No. 2:24-cv-04702 (C.D. Cal. Aug. 13, 2024).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: August 14, 2024
New York, New York

By: /s/ Jacqueline Lee Bonneau
Jacqueline Lee Bonneau